

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

HARRY A. CHURCH,

Plaintiff,

vs.

THE REDFLEX GROUP, INC.

Defendant.

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Case No. _____

NOTICE OF REMOVAL

Defendant Redflex Traffic Systems, Inc., sued as The Redflex Group, Inc., the Defendant herein, by its attorneys and pursuant to 28 U.S.C. § 1441 and § 1446, would respectfully show this Court as follows:

1. Defendant Redflex Traffic Systems, Inc., the Defendant in the above-referenced case, is a corporation incorporated under the laws of the State of Delaware with its principal place of business in Phoenix, Arizona. Plaintiff Harry A. Church is a citizen and resident of the State of Tennessee.

2. On March 8, 2011, Plaintiff Harry A. Church filed this action against Defendant in the Circuit Court of Washington County, Tennessee, and it is now pending therein. Defendant received a copy of the Summons and Complaint on or after May 26, 2011. True and exact copies of the Summons and Complaint are attached as Exhibit 1.

3. No other process, pleadings, or orders have been served upon or filed by the parties, and there have been no further proceedings in the Circuit Court of Washington County, Tennessee, as of this date.

4. This Court has original diversity jurisdiction of this action pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and the parties are citizens of different States.

5. Because this Court has original jurisdiction of this action pursuant to 28 U.S.C. § 1332, removal of the action to this Court is proper pursuant to 28 U.S.C. § 1441 (a) and (b).

6. This Notice of Removal is timely filed in accordance with U.S.C. § 1446(b), as it is filed with this Court within thirty days after receipt by the Defendant of the Summons and Complaint.

7. Pursuant to 28 U.S.C. § 1441(a), the United States District Court for the Eastern District of Tennessee, Greeneville Division, is the federal district court for the district and division embracing the place where the state court suit is pending.

8. Pursuant to 28 U.S.C. § 1446(d), all adverse parties are being provided with written notice of the filing of this Notice of Removal.

9. Also pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being filed with the Clerk of the Circuit Court of Washington County, Tennessee.

WHEREFORE, the Defendant removes the above-captioned case from the Circuit Court of Washington County, Tennessee, to this Court.

Dated this 24th day of June, 2011.

/s/ Michael S. Kelley
Michael S. Kelley BPR #014378
Kathy D. Aslinger BPR #019282
KENNERLY, MONTGOMERY & FINLEY, P.C.
4th Floor, Nations Bank Center
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P.O. Box 442
Knoxville, TN 37901
(865) 546-7311

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished by U.S. Mail,
postage prepaid, to the following, on this 24th day of June, 2011:

Richard Phillips
The Law Office of Richard Phillips
300 East Main Street, Ste # 302D
Johnson, City, TN 37601

/s/ Michael S. Kelley